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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Bass Underwriters, Inc.,

Plaintiff

v.

David Kono,

Defendant.

Case No: 2:22-cv-00138-RFB-EJY

**STIPULATION AND ORDER TO
CONTINUE THE DISPOSITIVE
MOTIONS DEADLINE**

(FIRST REQUEST)

Plaintiff Bass Underwriters, Inc. ("Bass") and Defendant David Kono ("Kono") stipulate for a (first request) continuation of the dispositive motions deadline, and in support whereof aver as follows:

1. On January 6, 2023, Bass moved on an emergency basis for leave to file an amended complaint to assert claims against Brooks, and to continue the discovery period. ECF No. 35. Kono filed his response on January 20, 2023 (ECF No. 37), and Bass filed a reply in support of its motion on January 31, 2023 (ECF No. 47). The Court issued an Order, denying the emergency status of the motion (ECF No. 36). This motion is currently pending before the Court.

2. On January 24, 2023, Kono moved, on an emergency basis, for a protective order precluding the deposition of Kono's employer, Brooks Group Insurance Agency, LLC's ("Brooks") corporate representative (ECF No. 39). Bass filed its response in opposition to this motion on February 6, 2023 (ECF No. 49), and Kono is scheduled to reply on February 13, 2023. The Court issued an Order, addressing the emergency request of the motion by staying Brooks' deposition until the motion is ruled upon (ECF No. 40). This motion is currently pending before the Court, and, as such, the deposition has not yet occurred.

3. While these motions remain pending, the March 1, 2023 deadline established in the existing Scheduling Order for filing dispositive motions remains in force (ECF No. 32).

4. The parties have conferred and, due to the several motions pending before the Court, for judicial efficiency, and the economy of the parties, the parties agree to a continuation of the dispositive motions deadline to March 15, 2023.

5. This stipulation is for good cause and not for purposes of delay.

IT IS SO STIPULATED.

Dated: February 8, 2023

Dated: February 8, 2023

/s/ Karl O. Riley
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ORDER

For good cause appearing,

IT IS SO ORDERED.

Dated: _____


RICHARD E. BOULWARE, II
United States District Court

DATED this 22nd day of February, 2023.